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Attorneys for The Regents of the University of  
California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

SOFIE KARASEK, individually;  
NICOLETTA COMMINS, individually;  
ARYLE BUTLER, individually;

Plaintiffs,

vs.

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, a public entity, and DOES 1  
through 100, inclusive,

Defendants.

Case No. 3:15-cv-03717-WHO

**JOINT CASE MANAGEMENT  
STATEMENT**

Date: January 11, 2022  
Time: 2:00 p.m.  
Place: Courtroom 2, 17th Floor  
Judge: Hon. William H. Orrick

1 Pursuant to Local Rule 16-10(d), counsel for Plaintiffs Sofie Karasek and Nicoletta  
2 Commins and counsel for Defendant The Regents of the University of California (the  
3 “University”) submit this Joint Case Management Statement in advance of the January 11, 2022  
4 status conference.

5 **1. Update Since Last Joint Case Management Statement**

6 Since the parties’ last joint case management statement, filed on October 12, 2021, the  
7 parties have continued discovery into both Ms. Karasek’s and Ms. Commins’s claims and the  
8 University’s defenses. Document production in response to written discovery is ongoing. The  
9 University has taken the deposition of Ms. Karasek, and will take the deposition of Ms. Commins  
10 on January 27, 2022. The University may elect to conduct defense medical examinations of both  
11 Ms. Karasek and Ms. Commins. The parties also anticipate developing expert testimony relating  
12 to damages and other relevant issues.

13 The University anticipates filing a motion for summary judgment after some or all  
14 discovery has been completed. The parties also anticipate making discovery motions should the  
15 need arise during the course of discovery, in addition to any necessary pre-trial motions. Further,  
16 to the extent that both Ms. Karasek’s and Ms. Commins’s claims proceed to trial, the University  
17 may also move to sever their claims for purposes of trial, in light of the high likelihood that  
18 evidence relating to each of their claims may be irrelevant and highly prejudicial with respect to  
19 the other’s claim.

20 **2. Settlement and ADR**

21 The parties mediated Ms. Karasek’s claim on December 7, 2021. Although the parties did  
22 not reach a mediated resolution on that date, both parties remain open to settlement of Ms.  
23 Karasek’s claim, and settlement discussions are ongoing. The parties have a scheduled mediation  
24 of Ms. Commins’s claim on February 24, 2022.

1 DATED: January 4, 2022

MUNGER, TOLLES & OLSON LLP

2 By: /s/ Elizabeth Douglas

3 ELIZABETH S.P. DOUGLAS

4 Attorney for Defendant

The Regents of the University of California

5  
6 DATED: January 4, 2022

THE ZALKIN LAW FIRM

7 By: /s/ Alexander Zalkin

ALEXANDER S. ZALKIN

8 Attorney for Plaintiffs

**FILER'S ATTESTATION**

I, Elizabeth S.P. Douglas, am the ECF user whose identification and password are being used to file this Joint Case Management Statement. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that the other above-named signatories concur in this filing.

DATED: January 4, 2022

By: /s/ Elizabeth Douglas

ELIZABETH S.P. DOUGLAS

Attorney for Defendant

The Regents of the University of California